

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

**IN RE:
DANILO DJURIC**

CHAPTER 13 PROCEEDINGS

CASE NO: 23-21501 JRA

Debtor(s)

**REQUEST FOR COURT TO
TAKE JUDICIAL NOTICE OF UNFILED TAX RETURNS**

Comes now Paul R. Chael, Standing Chapter 13 Trustee herein, and requests the Court to take judicial notice of the claim filed herein by the **INTERNAL REVENUE SERVICE**, and notes that said claim appears to be based on estimates because the Debtor has not filed tax returns for **2022**.

Trustee represents to the Court that without these tax amounts being liquidated, the Trustee would not be able to make a recommendation as to confirmation or the case would not be confirmable and would possibly be subject to further delay.

Wherefore, Trustee prays that the Court takes judicial notice of the proofs of claim filed by the above-mentioned taxing authority, that the Court issue such further relief as it deems appropriate in order to ensure that any unfiled returns are filed so that the administration of the case is not unduly delayed.

/S/ PAUL R. CHAEL
Paul R. Chael, Trustee
Indiana Atty No.3881-45

CERTIFICATE OF SERVICE

I hereby certify that on October 4, 2023, service of a true and complete copy of the above and foregoing pleading or paper was electronically sent through the court's ECF system to the following parties:

U.S. Trustee

Attorney for Debtor(s): DAN WHITTEN

and upon the following by depositing the same in the United States mail, envelopes properly address to each of them and with sufficient first-class postage affixed.

INTERNAL REVENUE SERVICE, 575 N. PENNSYLVANIA ST., STOP SB380, INDIANAPOLIS, IN 46204

DANILO DJURIC, 9012 MATHEWS ST, CROWN POINT, IN 46307 ,

/S/ PAUL R. CHAEL

Paul R. Chael, Trustee

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